

**THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO**

IN RE: ) CHAPTER 13  
 ) CASE NO: 19-50025  
WILLIAM J. HUET and LISA J. HUET, )  
 ) ALAN M. KOSCHIK  
DEBTOR(S) ) BANKRUPTCY JUDGE  
 )  
 ) **MOTION TO INCUR DEBT TO**  
 ) **PURCHASE A VEHICLE**

---

Now comes the Debtor(s), by and through undersigned counsel, and hereby moves this Court for approval to purchase a vehicle.

1. Terms of the purchase (type of vehicle, total purchase cost, length of loan, interest rate, monthly payment and from whom the Debtor(s) is buying the vehicle).

Debtor 2 is purchasing a 2014 Chrysler Town & Country with a purchase price of \$9,899; with tax, title, registration, and service contract, \$11,937.29. Monthly payments of \$276.46 for 60 months with an interest rate of 19.99%. Debtor 2 is trading in their 2009 GMC Acadia which had a payment of \$281.00/mo.

Lease a vehicle.

2. X Amended Schedule I and Schedule J been filed to support car purchase.
3. X The Debtor(s) has supplied the Trustee current pay remittances and most recent tax returns to support Debtor(s) request for a car purchase or lease. Note: These items are necessary even if Debtor(s) is replacing an existing car for the same monthly payment on Schedule J.
4. X The Debtor(s) is current in monthly Chapter 13 plan payments in the amount of \$896.00.
5. X The unsecured dividend will not be affected by the Debtor(s) request to purchase or lease a vehicle.
6. X The Debtor(s) needs a vehicle because:

Debtor 2's 2009 GMC Acadia, her primary means of transportation, is getting old and prohibitively expensive, maintenance-wise. This vehicle would replace the Acadia as her primary transportation.
7.   The Debtor(s) is replacing a current lease.
8. X If Debtor(s) contends existing car is too costly to repair, explain what steps Debtor(s) has

taken to keep current car operational. (What is the mileage on the existing car).

They have performed all routine maintenance (fluids, oil, etc.) and have completed repairs as they arise. The mileage of the current vehicle is 170,200.

9.  What is make and model of existing car.

2009 GMC Acadia

10.  The Debtor(s) current car is being paid through the Chapter 13 plan.

11.  If current car is being paid through the plan, please explain how the current car lender will be paid if Debtor(s) is proposing to trade in current car for a new car.

N/A

12.  If Debtor(s) is seeking to purchase or lease an additional car explain why the Debtor(s) needs an additional car.

Not applicable.

13.  Explain what efforts the Debtor(s) has made to obtain the best deal at the lowest interest rate possible.

The Debtors have inquired with multiple sellers. They aggressively negotiated the present deal (the dealership initially proposed a higher interest rate).

NOTE: All applicable items stated above must be included in the order, not simply reference the motion.

Respectfully submitted,

/s/ Rebecca J. Sremack  
Rebecca J. Sremack #0092313  
Attorney for Debtors  
Sremack Law Firm LLC  
2745 South Arlington Road  
Akron, Ohio 44312  
(330) 644-0061  
(330) 644-7241 fax  
info@sremacklaw.com

**CERTIFICATE OF SERVICE**

I hereby certify that on January 27, 2021, a copy of the foregoing *Motion to Incur Debt to Purchase Motor Vehicle* was sent via Regular Mail to:

William & Lisa Huet  
1609 Moreview Dr.  
Copley OH 44321

and

All creditors listed on the mailing matrix, which follows on the next page.

And via ECF to:

United States Trustee

and

Keith L. Rucinski, Chapter 13 Trustee

/s/ Rebecca J. Sremack  
Rebecca J. Sremack #0092313  
Attorney for Debtors

Label Matrix for local noticing  
0647-5  
Case 19-50025-amk  
Northern District of Ohio  
Akron  
Tue Jan 26 17:15:24 EST 2021

Ally Financial  
PO Box 380901  
Minneapolis, MN 55438-0901

PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

455 John F. Seiberling Federal Building  
US Courthouse  
2 South Main Street  
Akron, OH 44308-1848

Atlantic Credit & Finance Inc  
PO Box 2083  
Warren MI 48090-2083

Barclay Card Services  
PO Box 13337  
Philadelphia, PA 19101-3337

Barclays Bank Delaware  
PO Box 8803  
Wilmington, DE 19899-8803

Bureaus Investment Group Portfolio 15, LLC  
650 Dundee Rd Ste 370  
Northbrook IL 60062-2757

Bureaus Investment Group Portfolio No 15 LLC  
c/o PRA Receivables Management, LLC  
PO Box 41021  
Norfolk VA 23541-1021

Capital One Bank  
PO Box 6492  
Carol Stream, IL 60197-6492

Capital One Bank (USA), N.A.  
by American InfoSource as agent  
PO Box 71083  
Charlotte, NC 28272-1083

Capital One Bank USA NA  
ATTN: General Correspondence  
PO Box 30285  
Salt Lake City, UT 84130-0285

Capital One Retail Services  
PO Box 7680  
Carol Stream, IL 60116-7680

Client Services Inc  
3451 Harry S Truman Blvd  
St Charles MO 63301-9816

Crown Asset Management LLC  
3100 Breckenridge Blvd Ste 725  
Duluth GA 30096-7605

Fifth Third Bank  
PO Box 9013  
Addison, Texas 75001-9013

George Gusses Co LPA  
33 S Huron St  
Toledo OH 43604-8705

Home Depot  
PO Box 9001010  
Louisville, KY 40290-1010

Lowes/Synchrony Bank  
PO Box 530914  
Atlanta, GA 30353-0914

Lyons Doughty & Velduis PC/PA  
471 E Broad St 12th Fl  
Columbus, OH 43215-3806

Midland Funding LLC  
PO Box 2001  
Warren MI 48090-2001

Midland Funding LLC  
PO Box 2011  
Warren, MI 48090-2011

Mr Cooper  
8950 Cypress Waters Blvd  
Coppell, TX 75019-4620

Nationstar Mortgage LLC D/B/A Mr. Cooper  
P.O. Box 619094  
Dallas, TX 75261-9741  
8 75261-9094

Paolucci Law  
1 Cascade Pl. Ste. 1015  
Akron, OH 44308-1129

Quantum3 Group LLC as agent for  
Crown Asset Management LLC  
PO Box 788  
Kirkland, WA 98083-0788

Summa Health System  
1077 Gorge Blvd  
Akron OH 44310-2408

Synchrony Bank  
c/o PRA Receivables Management, LLC  
PO Box 41021  
Norfolk VA 23541-1021

Synchrony Bank/JCP  
PO Box 960090  
Orlando, FL 32896-0090

Synchrony Bank/ROS  
PO Box 530916  
Atlanta, GA 30353-0916

Derrick Rippy ust11  
Office of the U.S. Trustee  
H.M. Metzenbaum U.S. Courthouse  
201 Superior Avenue East Suite 441  
Cleveland, OH 44114-1234

Kathryn A. Belfance  
Roderick Linton Belfance LLP  
50 S. Main Street 10th Floor  
Akron, OH 44308-1849

Keith Rucinski  
Chapter 13 Trustee  
One Cascade Plaza Suite 2020  
Akron, OH 44308-1160

Lisa J. Huet  
1609 Moreview Drive  
Akron, OH 44321-1932

Rebecca J. Sremack  
Sremack Law Firm  
2745 S. Arlington Road  
Akron, OH 44312-4713

William J. Huet  
1609 Moreview Drive  
Akron, OH 44321-1932

William M. Sremack  
2745 S Arlington Road  
Akron, OH 44312-4713

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)FIFTH THIRD BANK

(u)Nationstar Mortgage LLC d/b/a Mr. Cooper

(d)PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

End of Label Matrix	
Mailable recipients	36
Bypassed recipients	3
Total	39